STELIOS COUTSODONTIS, et al.,

Defendants.

IT IS HEREBY STIPULATED AND AGREED that defendant GENERAL

MARITIME ENTERPRISES CORPORATION shall appear, answer, or otherwise move in the
above-captioned action on or before January 31, 2011; and

IT IS FURTHER STIPULATED AND AGREED that this Stipulation is without waiver of any rights and defenses, including but not limited to affirmative defenses of any nature whatsoever or defenses under Fed. R. Civ. P. 12(b); and

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be signed in counterparts with the same force and effect as if it was signed as an original document, and will be effective upon original signatures of all parties on such counterparts.

Dated: New York, New York January 4, 2011

BROWN GAVALAS & FROMM LLP Attorneys for Defendant GENERAL MARITIME ENTERPRISES

CORPORATION

Peter Skoufalos
355 Lexington Avenue
New York New York 10017

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Tel: (212) 983-8500

ANDERSON KILL & OLICK P.C.

Attorneys for Plaintiffs

SEA TRADE MARITIME CORPORATION

and GEORGE PETERS

R. Mark Keenan

1250 Avenue of the Americas

New York, New York 10020-1182

Tel: (212) 278-1000

SO ORDERED:

Henry B. Pitman, U.S.M.J.